

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Jenee K. Ciccarelli, Esq.
Fitzgerald & Associates, P.C.
649 Newark Ave.
Jersey City, NJ 07306

In Re:

Shamhan Shah,

Debtor.

Case No.: 17-24300
Judge: Sherwood
Chapter: 13

CHAPTER 13 DEBTOR=S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following (choose one):

1. ☒ Motion for Relief from the Automatic Stay filed by US Bank, Denise Carlon, Esq.
_____, creditor,

A hearing has been scheduled for December 14, 2017, at
11am.

☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for _____, at _____.

☐ Certification of Default filed by _____,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (choose one):

☐ Payments have been made in the amount of \$ _____, but have not
been accounted for. Documentation in support is attached.

☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

☒ Other (**explain your answer**):

I had the property listed with a realtor who told me that he had a buyer. However, after submitting the contract, I do not know what happened in terms of the short sale approval. I have been trying to meet with him with no success. At this time, would like additional time to change realtors. I signed a listing agreement with him and was locked into working with him. However, since he has failed to communicate with me. I am going to fire him and ask him for a release from the listing agreement.

I am making adequate protection payments to the lender starting in December 2017. My employment was really unstable the past year, but now I have a job with a stable doctor's office and I can make the payments.

My property is worth \$435K from the appraisal I had. The negative equity in the property is deminimis.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: 11/6/17


Debtor=s Signature

Date: _____

Debtor=s Signature

NOTES:

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee=s Motion to